



January 13, 2022

**VIA ECF**

The Honorable Paul A. Engelmayer  
 United States District Court  
 Southern District of New York  
 40 Foley Square, Room 2201  
 New York, NY 10007

Re: *Black v. Ganieva, et al.*, No. 1:21-cv-08824 (PAE)

Dear Judge Engelmayer:

I write on behalf of Plaintiff Leon Black to respectfully request an extension of Mr. Black's deadline to respond to Defendant Wigdor LLP's Motion for Sanctions in connection with the Complaint (ECF No. 33), which is presently set for January 24, 2022 (*see* ECF No. 34).

Mr. Black intends to file an amended complaint on or before January 28, 2022, in accordance with the Court's January 7, 2022 Order (ECF No. 32). The Court has ordered that, should Mr. Black amend his complaint, by February 18, 2022, Defendants shall "(1) file an answer; (2) file a new motion to dismiss; or (3) submit a letter to the Court, copying plaintiff, stating that they rely on the previously filed motion to dismiss." (*Id.*) To avoid unnecessary and duplicative motion practice, we respectfully request that the Court adopt a similar approach with regard to Wigdor's Motion for Sanctions, which will be mooted by the forthcoming amended complaint. We therefore ask that Mr. Black's deadline to respond to the Motion for Sanctions be extended until on or after January 28, 2022.<sup>1</sup> We further request that, upon the filing of the amended complaint, the Motion for Sanctions be denied as moot, with Wigdor having the option, by February 18, 2022 to (1) file a new motion; (2) submit a letter

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<sup>1</sup> An extension of Mr. Black's deadline to respond is particularly appropriate here, as Wigdor's motion exceeds the page limits set forth in the Court's Individual Rules and Practices. *See* Rule 3.I of Judge Engelmayer's Individual Rules and Practices.

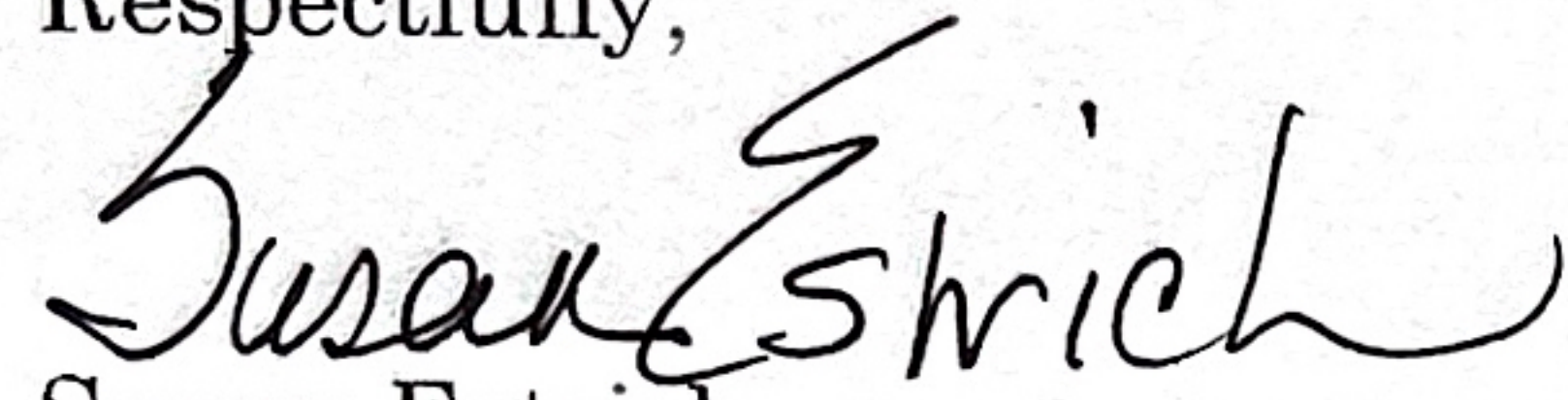


to the Court, copying plaintiff, stating that they rely on the previously filed motion for sanctions; or (3) withdraw its request for sanctions.

We have raised this issue with counsel for Wigdor, who has informed us that Wigdor does not consent to this request.

Thank you for your attention to this matter.

Respectfully,

A handwritten signature in black ink that reads "Susan Estrich". The signature is fluid and cursive, with the first name "Susan" and last name "Estrich" clearly legible.

Susan Estrich

Counsel for Plaintiff

Cc: All Counsel of Record (by ECF)

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